



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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Ref: 8EPR-N

JAN 20 2009

Mr. Michael J. Ryan  
Regional Director  
Great Plains Region  
Bureau of Reclamation  
P.O. Box 36900  
Billings, MT 59107-6900

RE: Northwest Area Water Supply  
(NAWS) Project on Water Treatment FEIS:  
CEQ# 20080509

Dear Mr. Ryan:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the proposed Northwest Area Water Supply (NAWS) Project on Water Treatment. Our comments are provided in accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

The NAWS project is a bulk water supply system that will serve the municipal and rural water needs of the project area in North Dakota, including 10 counties in northwest North Dakota. EPA acknowledges the need for this project to address water quality and quantity issues for residents in the project area. The project will withdraw 15,000 acre feet of water from Lake Sakakawea on the Missouri River. Water will be pumped 45 miles north to the city of Minot which will serve as the distribution point for city residents, other communities and rural water systems throughout the service area. The transfer of water from Lake Sakakawea (located within the Missouri River Basin) to Minot and other cities in the Hudson Bay Basin has the potential to transfer aquatic invasive species between basins and is the key environmental risk associated with operating this project.

The preferred alternative for the Project has been identified as a combination of treatment processes including the chemical disinfection process evaluated as part of the No Action Alternative and the ultraviolet (UV) disinfection processes evaluated as part of the action alternatives. The preferred alternative takes into account recommendations EPA made in the DEIS for the No Action Alternative to apply UV treatment technology at Max instead of Minot. This change will provide additional safeguards and risk reduction for the pipeline between Max and Minot. In addition, we acknowledge that the comprehensive adaptive management plan and

stakeholder coordination that the Bureau envisions will play a significant role in resource management and in managing risk and uncertainty for the overall project.

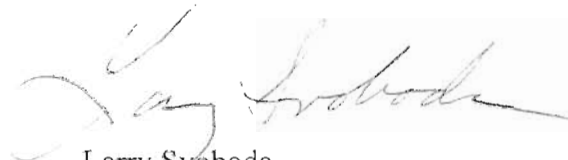
Following are a few comments on the FEIS in the paragraphs below. None of these comments represent significant concerns regarding the preferred alternative but are offered for the purposes of further clarifying the document.

- Summary Table 2.6 on page 2-15 of the FEIS summarizes and compares design capability that each of the biota treatment alternatives described in the DEIS would receive under the current U.S. drinking water treatment regulations as well as the construction costs by alternative. However, this table does not include the *preferred alternative* described in the FEIS. PA recommends that the Record Of Decision (ROD) include a table that summarizes and compares all of the proposed alternatives, including no action and the preferred alternative, side by side in order to clearly compare and understand the differences in cost and treatment for these five alternatives
- In the Appendices, response 34-3, it should be clarified that if full treatment is provided at Max, then the water would meet National Primary Drinking Water Regulations and can bypass the treatment train at Minot and enter the clear well directly. It is the City's choice to further treat the water to reduce hardness for aesthetic considerations to meet the secondary Maximum Contaminant Levels (MCLs) for hardness. It is important to note that softening is not required to further reduce the risk of transferring invasive species nor is it required by the Safe Drinking Water Act. Secondary MCLs are recommendations only. Nonetheless, if softening is employed it will provide further reductions of pathogens as demonstrated in the treatment options in the Long Term 2 Enhanced Surface Water Treatment Rule (LT2 Rule).
- On page 2-15, in the paragraph that begins "Table 2.6..." "The no action treatment alternative achieves the log reduction for Giardia and viruses of 3 and 4 logs respectively, according to the Surface Water Treatment Rules by inactivation only; similar to what an unfiltered system would be required to achieve." Also Crypto reduction would be achieved by inactivation only and would be equivalent to an unfiltered system with a mean crypto level of greater than 0.01 oocysts/L, which must provide at least 3 logs of crypto inactivation. The basic treatment alternative adds an additional 0.5 log of removal credit. Neither of these options meets the bin requirements for filtered systems because full treatment is required. Bin 1 assumes 2 logs of removal by looking at the minimum logs of removal in a data set. Bin 2 assumes 3 logs of removal by using the average logs of removal in the same data set. A system required to meet bin 2 needs to add an additional 1.0 log reduction for a total of 4.0 logs, bin 3 needs to add an additional 2.0 logs for a total of 5.0 logs and bin 4 needs to add an additional 2.5 logs for a total of 5.5 logs of reduction.

- On page 2-16 in the paragraph below Figure 2.7, EPA suggests clarifying the second sentence to read “The figure shows that the Conventional Treatment Alternative would adequately remove Crypto and Giardia or other similarly sized organisms to 2-3 logs. The removal of viruses is achieved due to their attachment to other larger particles. In addition, chlorine is very effective in the inactivation of viruses; ....”

EPA appreciates the opportunity to review this FEIS. We look forward to continuing to work with the Bureau on activities related to this project and providing input to the adaptive management plan. If you have any questions on these comments, please feel free to contact me at (303) 312-6004.

Sincerely,

A handwritten signature in dark ink, appearing to read "Larry Svoboda", is written over a light gray rectangular background.

Larry Svoboda  
NEPA Program Director

cc: Dennis Breitsman, Bureau of Reclamation  
Richard Nelson, Bureau of Reclamation  
Alicia Waters, Bureau of Reclamation